

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,)	No. _____
)	
Plaintiff,)	<u>COUNT ONE:</u> All Defendants
)	Conspiracy to Distribute Methamphetamine
v.)	21 U.S.C. §§ 841(a)(1) and (b)(1)(A)
)	and 846
CLARK L. VANOSDOLL)	NLT 10 Years and NMT Life Imprisonment
[DOB: 07/04/1967])	NMT \$4,000,000 Fine
)	NLT 5 Years Supervised Release
FRANK G. RENDON,)	Class A Felony
[DOB: 11/25/1968])	
)	<u>COUNT TWO:</u> VANOSDOLL, KERMER,
ELMER GUZMAN-VALENCIA,)	WEBSTER, MCCOLLUM, DAMRON,
a/k/a Elmo and Armando Valencia)	LEWIS, and HEREDIA-TORRES
[DOB: 12/17/1982])	Conspiracy
)	18 U.S.C. § 371
STEVEN G. BEEDLE,)	NMT 5 Years Imprisonment
[DOB: 03/14/1985])	NMT \$250,000 Fine
)	NMT 3 Years Supervised Release
ANGELA D. HAYS,)	Class D Felony
a/k/a Angie)	
[DOB: 07/30/1976])	<u>COUNTS THREE, FOUR, and FIVE:</u>
)	MOLINA-PEZINA (CTS. 3 & 4)
JUAN C. MOLINA-PEZINA,)	GUZMAN-VALENCIA (CT. 5)
a/k/a Chopis)	Distribution of a Controlled Substance and
[DOB: 06/22/1980])	Possession With Intent to Distribute
)	21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
MELINDA R. KERMER,)	NMT 20 Years Imprisonment
[DOB: 07/15/1985])	NMT \$1,000,000 Fine
)	NLT 3 Years Supervised Release
BRAD D. WEBSTER,)	Class C Felony
[DOB: 01/24/1964])	
)	<u>COUNT TEN:</u> MOLINA-PEZINA and
SIMON HEREDIA-TORRES,)	BEEDLE
a/k/a Luis)	Possession With Intent to Distribute
[DOB: 09/22/1977])	21 U.S.C. §§ 841(a)(1) and (b)(1)(B)
)	NLT 5 Years Imprisonment; NMT 40 Years
JEFFREY S. LEWIS,)	NMT \$2,000,000 Fine
a/k/a JJ)	NLT 4 Years Supervised Release
[DOB: 08/22/1966])	Class B Felony

MICHAEL S. McCOLLUM,
[DOB: 10/19/1950]

MITZI S. DAMRON,
a/k/a Mitzi Webster
[DOB: 01/26/1974]

ROXIE A. BOLING,
[DOB: 10/05/1982]

ANTHONY J. PETTY,
[DOB: 05/19/1980]

TERRY E. DECK,
[DOB: 05/04/1961]

Defendants.

Defendants/Counts:

VANOSDOLL: 1, 2, 8 and 9

RENDON: 1 and 11

GUZMAN-VALENCIA: 1, 5, 6 and 7

BEEDLE: 1, 10, 12, 13, 14 and 20

HAYS: 1

MOLINA-PEZINA: 1, 3, 4, 7 and 10

KERMER: 1, 2 and 17

WEBSTER: 1, 2, 15 and 16

HEREDIA-TORRES: 1, 2 and 15

LEWIS: 1, 2, 18 and 19

McCOLLUM: 1 and 2

DAMRON: 1, 2, 15 and 16

R. BOLING: 1 and 11

PETTY: 1

DECK: 1

COUNT SIX: GUZMAN-VALENCIA

Illegal Re-entry

8 U.S.C. § 1326

NMT Two Years Imprisonment

NMT \$250,000 Fine

NMT One Year Supervised Release

Class E Felony

COUNT SEVEN: GUZMAN-VALENCIA
and MOLINA-PEZINA

Possession With Intent to Distribute

21 U.S.C. §§ 841(a)(1) and (b)(1)(A)

NLT 10 Years and NMT Life Imprisonment

NMT \$4,000,000 Fine

NLT 5 Years Supervised Release

Class A Felony

COUNT EIGHT: VANOSDOLL

Aggravated Identity Theft

18 U.S.C. §§ 1028(a)(5) and (b)(1)

NMT 15 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

COUNT NINE: VANOSDOLL

Aggravated Identity Theft

18 U.S.C. §§ 1028(a)(1),(a)(3) and (b)(1)

NMT 15 Years' Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

COUNT ELEVEN: RENDON and BOLING

Possession With Intent to Distribute

21 U.S.C. §§ 841(a)(1) and (b)(1)(C)

NMT 20 Years Imprisonment

NMT \$1,000,000 Fine

NLT 3 Years Supervised Release

Class C Felony

) COUNTS TWELVE and TWENTY:
) BEEDLE
) Possession With Intent to Distribute
) 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
) NMT 20 Years Imprisonment
) NMT \$1,000,000 Fine
) NLT 3 Years Supervised Release
) Class C Felony
)
) COUNT THIRTEEN: BEEDLE
) Firearm in Furtherance of Drug Trafficking
) Crime
) 18 U.S.C. § 924(c)(1)(A)
) NLT 5 Years Imprisonment (Consecutive)
) NMT Life Imprisonment
) NMT \$250,000 Fine
) NMT 5 Years Supervised Release
) Class A Felony
) \$100 Mandatory Special Assessment
) (Counts One through Twenty)
)
) COUNT FOURTEEN: BEEDLE
) Possessing a Firearm as an Unlawful User of
) a Controlled Substance
) 18 U.S.C. §§ 922(g)(3) and 924(a)(2)
) NMT 10 Years Imprisonment
) NMT \$250,000 Fine
) NMT 3 Years Supervised Release
) Class C Felony
)
) COUNT FIFTEEN: HEREDIA-TORRES,
) WEBSTER, and DAMRON
) Aggravated Identity Theft
) 18 U.S.C. §§ 1028(a)(1),(b)(1)(A)(ii) and
) (b)(1)(B)
) NMT 15 Years Imprisonment
) NMT \$250,000 Fine
) NMT 3 Years Supervised Release
) Class C Felony
)
)
)

-) COUNT SIXTEEN: WEBSTER and
-) DAMRON
-) Aggravated Identity Theft
-) 18 U.S.C. §§ 1028(a)(5) and (b)(1)(C)
-) NMT 15 Years Imprisonment
-) NMT \$250,000 Fine
-) NMT 3 Years Supervised Release
-) Class C Felony
-)
-) COUNT SEVENTEEN: KERMER
-) Possession With Intent to Distribute
-) 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
-) NMT 20 Years Imprisonment
-) NMT \$1,000,000 Fine
-) NLT 3 Years Supervised Release
-) Class C Felony
-)
-) COUNT EIGHTEEN: LEWIS
-) Distribution of a Controlled Substance
-) 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
-) NMT 20 Years Imprisonment
-) NMT \$1,000,000 Fine
-) NLT 3 Years Supervised Release
-) Class C Felony
-)
-) COUNT NINETEEN: LEWIS
-) Unlawful Firearms Possession
-) 18 U.S.C. §§ 922(g)(1) and 924(a)(2)
-) NMT 10 Years Imprisonment
-) NMT \$250,000 Fine
-) NMT 3 Years Supervised Release
-) Class C Felony
-)
-) **FORFEITURE ALLEGATIONS:**
-) 21 U.S.C. § 853 (Criminal Forfeiture)
-) 18 U.S.C. § 982 (Criminal Forfeiture)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

From a date unknown to the Grand Jury but beginning no later than on or about February 1, 2006, to at least on or about May 31, 2010, in the Western District of Missouri and elsewhere, the defendants, CLARK L. VANOSDOLL, FRANK G. RENDON, ELMER GUZMAN-VALENCIA, a/k/a Elmo, a/k/a Armando Valencia, STEVEN BEEDLE, ANGELA D. HAYS, a/k/a Angie, JUAN C. MOLINA-PEZINA, a/k/a Chopis, MELINDA R. KERMER, BRAD D. WEBSTER, SIMON HEREDIA-TORRES, a/k/a Luis, JEFFREY S. LEWIS, a/k/a JJ, MICHAEL S. McCOLLUM, MITZI S. DAMRON, a/k/a Mitzi Webster, ROXIE A. BOLING, ANTHONY J. PETTY, and TERRY DECK, did knowingly and intentionally combine, conspire, confederate, and agree with each other, with Michelle Stevens, a co-conspirator not indicted herein, and with others, both known and unknown to the Grand Jury, to possess with intent to distribute and to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), all in violation of Title 21, United States Code, Section 846.

Manner and Means

1. It was a part of the conspiracy that defendants CLARK L. VANOSDOLL, BRAD D. WEBSTER, JEFFREY S. LEWIS, a/k/a JJ and MICHAEL S. McCOLLUM, would create false identification documents and counterfeit checks for themselves and others, including Oriana M. Valle, a/k/a Monique Fletcher, a/k/a Oriana M. McComas, a co-conspirator not indicted herein, to obtain cash or items to sell or trade for methamphetamine.

Overt Acts

2. The following overt acts, among others, were committed by the defendants in furtherance of the conspiracy:

a. The allegations in Counts Three, Four, Five, Seven, Ten, Eleven, Twelve, Seventeen, Eighteen and Twenty of this Indictment are fully incorporated by reference herein as overt acts committed in furtherance of this conspiracy.

b. On or about April 4, 2006, defendant ELMER GUZMAN-VALENCIA, a/k/a Elmo, a/k/a Armando Valencia, distributed an amount of methamphetamine to another person.

c. On or about April 5, 2006, defendant ELMER GUZMAN-VALENCIA, a/k/a Elmo, a/k/a Armando Valencia, distributed an amount of methamphetamine to another person.

d. On or about April 6, 2006, defendant ELMER GUZMAN-VALENCIA, a/k/a Elmo, a/k/a Armando Valencia, possessed with intent to distribute an amount of methamphetamine.

e. On or about April 11, 2007, defendant STEVEN BEEDLE, possessed with intent to distribute an amount of methamphetamine.

f. On or about February 4, 2008, defendant MELINDA R. KERMER, possessed a firearm and a quantity of ammunition, that is, an FIE, Model E22, .22 caliber pistol, serial number AB05004, and nine (9) live rounds of .22-caliber ammunition.

COUNT TWO

From at least on or about October 18, 2006, the exact date being unknown to the Grand Jury, and continuing through on or about October 31, 2008, in the Western District of Missouri, and elsewhere, the defendants, CLARK L. VANOSDOLL, MELINDA R. KERMER, BRAD D. WEBSTER, MICHAEL S. McCOLLUM, MITZI S. DAMRON, a/k/a Mitzi Webster, JEFFREY S. LEWIS, a/k/a JJ, and SIMON HEREDIA-TORRES, a/k/a Luis, did knowingly and intentionally combine, conspire, confederate, and agree with each other, with Oriana M. Valle, a/k/a Monique Fletcher, Oriana M. McComas, a co-conspirator not indicted herein, and with others, both known and unknown to the Grand Jury, to commit offenses against the United States, that is:

- a. to make, utter, and possess counterfeited and forged securities of organizations, with intent to deceive other persons and organizations, contrary to the provisions of Title 18, United States Code, Section 513(a);
- b. to knowingly and without lawful authority produce an identification document, authentication feature, or a false identification document, contrary to the provisions of Title 18, United States Code, Section 1028(a)(1);
- c. to knowingly transfer an identification document, authentication feature, or a false identification document knowing that such document or feature was stolen or produced without lawful authority, contrary to the provisions of Title 18, United States Code, Section 1028(a)(2); and
- d. to knowingly transfer, possess, and use in and affecting interstate and foreign commerce, without lawful authority, a means of identification of another person,

to wit: name, social security number, date of birth, and driver's license and identification number, with the intent to commit, and to aid and abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, to wit: conspiracy to possess with intent to distribute and to distribute a controlled substance, contrary to the provisions of Title 21, United States Code, Section 846, and to possession with intent to distribute, contrary to the provisions of Title 21, United States Code, Section 841(a)(1), and the offense was committed to facilitate a drug trafficking crime, as defined in Title 18, United States Code, Section 929(a)(2), contrary to the provisions of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(3)(A), and 2.

Objectives of the Conspiracy

1. In general, it was the object of the conspiracy for the defendants and others to obtain money and property by selling false identification documents, including driver's and non-drivers licences, and Social Security cards. It was also the object of the conspiracy to unjustly enrich themselves and others to use a computer to generate counterfeit checks and forms of identification in order to purchase merchandise and receive currency with the counterfeit checks at retail stores throughout the Western District of Missouri and elsewhere.

Manner and Means of the Conspiracy

2. The manner and means by which the objectives of the conspiracy were accomplished included, but were not limited to, the following:

3. It was a part of the conspiracy that the defendants, using stolen personal and financial information, would and did produce counterfeit identifications, primarily counterfeit Missouri driver's licenses and non-driver identification cards.

4. It was a further part of the conspiracy that the defendants would and did use the counterfeit identification cards they had produced as proof of identity in order to obtain property, services, and cash. The defendants would then return or otherwise dispose of the purchased property in exchange for cash or drugs.

5. It was a further part of the conspiracy that defendants negotiated, attempted to negotiate, and caused the negotiation of the counterfeited and forged checks.

Overt Acts

6. In furtherance of the conspiracy, and to achieve the objects of the conspiracy, at least one of the defendants committed, and caused to be committed at least one of the following overt acts, among others, in the Western District of Missouri, and elsewhere:

a. On December 6, 2006, defendant CLARK VANOSDOLL possessed laptop computers, a “How to Get New ID” CD, a computer software program called Versa Check, three hundred seventeen (317) blank checks from the account belonging to Chris Fawl, 478 E. 300 Road, Overbrook, Kansas 66524; twenty (20) checks from the account identified as WC Construction LLC, PO Box 28509, Kansas City, Missouri 64152, First Bank of Missouri in Gladstone, Missouri.

b. On January 5, 2008, defendants BRAD WEBSTER and MITZI DAMRON possessed computer equipment, numerous counterfeit identifications, blank payroll checks, stolen checkbooks, stolen Social Security cards, a computer software program called Versa Check, four hundred fifty-six (456) blank checks from multiple commercial and personal accounts.

c. The defendants produced counterfeit identification cards, primarily

counterfeit Missouri driver's licenses and non-driver identification cards.

d. Counts Eight, Nine, Fifteen, and Sixteen of this Indictment are fully incorporated by reference herein as overt acts committed in furtherance of this conspiracy.

All in violation of Title 18, United States Code, Section 371.

COUNT THREE

On or about April 12, 2006, in the Western District of Missouri, the defendant, JUAN MOLINA-PEZINA, a/k/a Chopis, aiding and abetting others, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and N, N-Dimethylamphetamine, a Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOUR

On or about April 17, 2006, in the Western District of Missouri, the defendant, JUAN MOLINA-PEZINA, a/k/a Chopis, aiding and abetting others, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

On or about June 14, 2007, in the Western District of Missouri, the defendant, ELMER A. GUZMAN-VALENCIA, a/k/a Elmo, a/k/a Armando Valencia, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable

amount of N, N-Dimethylamphetamine, a Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT SIX

On or about June 14, 2007, in the Western District of Missouri, the defendant, ELMER GUZMAN-VALENCIA, a/k/a Elmo, a/k/a Armando Valencia, an alien who had been previously deported and removed on or about December 22, 2006, from the United States, knowingly and unlawfully was found in the United States at Kansas City, Missouri, the defendant having not obtained the consent of the Attorney General of the United States for re-application by the defendant for admission into the United States, contrary to the provisions of Title 8, United States Code, Sections 1326(a) and (b)(2).

COUNT SEVEN

Between on or about June 14, 2007, and August 3, 2007, in the Western District of Missouri and elsewhere, the defendants, ELMER GUZMAN-VALENCIA, a/k/a Elmo, a/k/a Armando Valencia, and JUAN C. MOLINA-PEZINA, a/k/a Chopis, aiding and abetting each other and others, did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in an amount five hundred (500) grams or more, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT EIGHT

On or about July 19, 2007, in the Western District of Missouri, the defendant, CLARK VANOSDOLL, in a matter affecting interstate commerce, had custody and control of, and possessed document-making implements with the intent such document-making implement

would be used in the production of false identification documents, to wit: a Dell XPS Computer Tower, a Hewlett Packard (HP) Photosmart scanner, a HP fax/printer/scanner/copier, and a HP printer/scanner/copier/fax, contrary to the provisions of Title 18, United States Code, Sections 1028(a)(5) and (b)(1).

COUNT NINE

From on or about July 19, 2007, to on or about August 14, 2007, in the Western District of Missouri, and elsewhere, the defendant, CLARK VANOSDOLL, did knowingly possess with the intent to use unlawfully and transfer unlawfully five or more identification documents not issued lawfully for the use of the defendant, authentication features, and false identification documents, to wit, driver's licenses, Social Security cards, and personal identification cards, the transfer, possession, or use of identification documents, authentication features, and false identification documents was in or affected interstate commerce, contrary to the provisions of Title 18, United States Code, Sections 1028(a)(3), (b)(1), and 2.

COUNT TEN

On or about August 9, 2007, in the Western District of Missouri, the defendant, JUAN C. MOLINA-PEZINA, a/k/a Chopis, and STEVEN G. BEEDLE, aiding and abetting each other and others, did knowingly and intentionally possess with intent to distribute five (5) grams or more of methamphetamine (actual), a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT ELEVEN

On or about September 18, 2007, in the Western District of Missouri, the defendants,

FRANK RENDON and ROXIE A. BOLING, aiding and abetting each other and others, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWELVE

On or about October 11, 2007, in the Western District of Missouri, the defendant, STEVEN BEEDLE, aiding and abetting others, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THIRTEEN

On or about October 11, 2007, in the Western District of Missouri, the defendant, STEVEN BEEDLE, in furtherance of drug trafficking crimes, that is, conspiracy to distribute and possess with intent to distribute methamphetamine, as charged in Count One, and possession with intent to distribute methamphetamine, as charged in Count Twelve, did knowingly possess firearms, to wit, a Colt Government, Model MK .IV Series 70, .45-caliber pistol, serial number 70B15811; a Feather Industries Inc., .22-caliber rifle, serial number B13042, contrary to the provisions of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOURTEEN

On or about October 11, 2007, in the Western District of Missouri, the defendant, STEVEN BEEDLE, who was an unlawful user of, or addicted to, methamphetamine, a controlled

substance as defined in Title 21, United States Code, Section 802, did knowingly possess, in and affecting commerce, firearms and ammunition, to wit, a Colt Government, Model MK .IV Series 70, .45-caliber pistol, serial number 70B15811; a Feather Industries Inc., .22-caliber rifle, serial number B13042; forty-two (42) rounds of Fiocchi .380-caliber ammunition, one (1) round of Federal .22-caliber ammunition, and one (1) round of CCI .22-caliber ammunition, all of which had been transported in interstate commerce, contrary to the provisions of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT FIFTEEN

From on or about September 19, 2007, until on or about January 5, 2008, in the Western District of Missouri, the defendants, SIMON HEREDIA-TORRES, a/k/a Luis, BRAD D. WEBSTER, and MITZI DAMRON, a/k/a Mitzi Webster, aiding and abetting each other and others, did knowingly and without lawful authority produce more than five identification documents or false identification documents, which documents were in or affected interstate or foreign commerce, to wit, driver's licenses and personal identification cards, contrary to the provisions of Title 18, United States Code, Sections 1028(a)(1), (b)(1)(A)(ii), and (b)(1)(B), and 2.

COUNT SIXTEEN

On or about January 5, 2008, in the Western District of Missouri, the defendants, BRAD D. WEBSTER and MITZI DAMRON, a/k/a Mitzi Webster, in a matter affecting interstate commerce, had custody and control of, and possessed document-making implements with the intent such document-making implement would be used in the production of false identification documents, to wit: two SanDisk Cruzer thumb drives, a HP Pavilion laptop computer, an

external hard drive, a Kodak digital camera, a Samsung digital camera, a Canon scanner, and two Canon printers, contrary to the provisions of Title 18, United States Code, Sections 1028(a)(5) and (b)(1).

COUNT SEVENTEEN

On or about February 4, 2008, in the Western District of Missouri, the defendant, MELINDA R. KERMER, aiding and abetting others, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

On or about April 30, 2008, in the Western District of Missouri, the defendant, JEFFREY LEWIS, a/k/a JJ, aiding and abetting others, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINETEEN

On or about October 13, 2008, in the Western District of Missouri, the defendant, JEFFREY S. LEWIS, a/k/a JJ, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a Mossberg, Model 183KA, 410 caliber shotgun, which had been transported in interstate

commerce, contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWENTY

On or about December 26, 2008, in the Western District of Missouri, the defendant, STEVEN G. BEEDLE, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE ALLEGATIONS **NOTICE OF DRUG FORFEITURE**

The Grand Jury further finds that:

1. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of one or more of the controlled substance offenses alleged in Counts One, Three through Five, Seven, Ten through Twelve, Seventeen, Eighteen, and Twenty of this Indictment, defendants CLARK L. VANOSDOLL, FRANK G. RENDON, ELMER GUZMAN-VALENCIA, a/k/a Elmo, a/k/a Armando Valencia, STEVEN BEEDLE, ANGELA D. HAYS, a/k/a Angie, JUAN C. MOLINA-PEZINA, a/k/a Chopis, MELINDA R. KERMER, BRAD D. WEBSTER, SIMON HEREDIA-TORRES, a/k/a Luis, JEFFREY S. LEWIS, a/k/a JJ, MICHAEL S. McCOLLUM, MITZI S. DAMRON, a/k/a Mitzi Webster, ROXIE A. BOLING, ANTHONY J. PETTY, and TERRY DECK, shall forfeit to the United States of America:

a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and

b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

2. The property to be forfeited includes, but is not limited to, the following:

a. MONEY JUDGMENT - A sum of money equal to \$ 1,000,000.00 in United States currency, representing the amount of proceeds obtained as a result of the commission of the violations alleged in Count One, for which the defendants are jointly and severally liable;

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

NOTICE OF IDENTITY THEFT FORFEITURE

4. The allegations contained in Counts Two, Nine, and Sixteen of this Indictment are realleged and incorporated by reference for the purpose of alleging forfeitures to the United States of America, pursuant to the provisions of Title 18, United States Code, Sections

982(a)(2)(B), 981 (a)(1)(c), and 1028(b)(5).

5. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 1028 set forth in Counts Two, Nine, and Sixteen of this Indictment, the defendants, CLARK VANOSDOLL, BRAD D. WEBSTER, and MITZI DAMRON, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations, and pursuant to Title 18, United States Code, Section 1028(b)(5), any personal property used or intended to be used to commit the offenses. The property to be forfeited includes, but is not limited to:

a. As to defendants BRAD D. WEBSTER and MITZI DAMRON, they shall forfeit their interest in the following property:

1. HP Pavilion Entertainment PC laptop computer, serial no. CNF73023NB;
2. Sony Vaio laptop computer, serial no. 282094383001303;
3. External Hard Drive, serial no. WXCX07115263;
4. Kodak Easy Share C633 digital camera, serial no. KCGGL71502010;
5. Samsung digital camera, model no. SC-DC173U;
6. Canon scanner, serial no. KCPA13707;
7. Canon printer, serial no. HFKP01090;
8. Canon printer, serial no. QC2-42404-DB01-01;
9. Two (2) SanDisk Cruzer 1.0 GB Micro thumb drives;

b. As to defendant CLARK VANOSDOLL, he shall forfeit his interest in the following property:

10. Dell XPS Gen4 computer tower, serial no. 4J5FC61;
11. HP Printer, Scanner, Copier, serial no. CN67TJG1N4;
12. HP Printer Combo, serial no. CN61GEH520;
13. HP Photosmart scanner, serial no. MY582931; and
14. Dell Axim PDA.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. Cannot be located upon exercise of due diligence;
- b. Has been transferred or sold to, or deposited with a third party;
- c. Has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b)(5) and
Title 28, United States Code, Section 2461(c).

A TRUE BILL

/s/ Micheal R. Bailey
FOREPERSON OF THE GRAND JURY

/s/ Rudolph R. Rhodes IV
Rudolph R. Rhodes IV
Assistant United States Attorney

DATED: 1/25/11